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10 **UNLIMITED JURISDICTION**  
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **FOR THE COUNTY OF LOS ANGELES**

13 WILLIAM TAYLOR,  
14

15 Plaintiff,

16 vs.

17 CITY OF BURBANK and DOES 1 through  
18 100, inclusive,

19 Defendants.  
20

CASE NO. BC 422 252

[Assigned to the Hon. John L. Segal,  
Judge, Dept. "50"]

PLAINTIFF'S LIST OF STIPULATED  
FACTS

Action Filed: September 22, 2009  
FSC: February 29, 2012  
Trial: March 5, 2012

21  
22 Plaintiff WILLIAM TAYLOR, by and through his counsel of record, submits the  
23 following List of Stipulated Facts:

24 1. Deputy Chief Bill Taylor recommended to Chief Stehr that an officer be  
25 placed on administrative leave pending a sexual harassment investigation  
26

27 Authority: Request for Admission No. 1 to Defendant City of Burbank, Set One

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1           2.     Deputy Chief Bill Taylor recommended to Chief Stehr that an outside agency  
2 be brought in to investigate burglary that had occurred in the Burbank Police Department.

3           Authority:     Request for Admission No. 8 to Defendant City of Burbank, Set One  
4

5  
6           3.     Michael Flad told Bill Taylor, referring to his own experience, that as number  
7 two administrator in a city department, it is sometimes your job to implement decisions by  
8 your boss that will not be popular, and that the number two sometimes takes a  
9 disproportionate amount of blame or repercussions for his/her boss's decisions.

10          Authority:     Request for Admission No. 21 to Defendant City of Burbank, Set One  
11

12          Dated: March 1, 2012

LAW OFFICES OF GREGORY W. SMITH

13  
14          By: 

15               GREGORY W. SMITH  
16               Attorneys for Plaintiff  
17               WILLIAM TAYLOR  
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PROOF OF SERVICE

STATE OF CALIFORNIA )  
 )  
COUNTY OF LOS ANGELES )

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 345E, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : March 2, 2012

DOCUMENT SERVED : **PLAINTIFF'S LIST OF STIPULATED FACTS**

PARTIES SERVED : **SEE ATTACHED SERVICE LIST.**

XXX (BY REGULAR MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Beverly Hills, California. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

XXX (BY ELECTRONIC MAIL) I caused such document to be electronically mailed to **Christopher Brizzolara, Esq.** at the following e-mail address: samorai@adelphia.net.

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on March 2, 2012.

\_\_\_\_\_  
Selma I. Francia

**SERVICE LIST**

**WILLIAM TAYLOR v. CITY OF BURBANK  
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC 422 252**

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